

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. 24- _____</b>
	:	<b>DATE FILED: _____</b>
<b>v.</b>		
<b>JAMES SESSOMS</b>	:	<b>VIOLATIONS:</b>
	:	<b>7 U.S.C. § 2024(b) (SNAP fraud- 1 count)</b>
	:	<b>18 U.S.C. § 1035 (false statements in</b>
	:	<b>connection with health care benefits</b>
	:	<b>- 7 counts)</b>
	:	<b>42 U.S.C. § 408(a)(7) (Social Security</b>
	:	<b>fraud- 7 counts)</b>
		<b>Notices of forfeiture</b>

**INDICTMENT**

**COUNT ONE**  
**(SNAP Fraud)**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. The Supplemental Nutrition Assistance Program (“SNAP”) is funded by the United States Department of Agriculture (“USDA”) in accordance with the Food Stamp Act of 1977. The USDA works with state governmental agencies, including the Commonwealth of Pennsylvania’s Department of Human Services (“PA DHS”), to provide SNAP benefits to eligible beneficiaries.

2. Medical Assistance, also known as Medicaid, is a jointly funded, federal-state health care insurance program by the United States Department of Health and Human Services (“HHS”). Medicaid constitutes a “health care benefit program” as that term is defined by Title 18, United States Code, Section 24(b). Medicaid is intended to benefit low-income and

needy people. It covers children, the aged, blind, disabled, and other people who are eligible to receive federally assisted income maintenance payments.

3. The Medicaid program pays for medical assistance for eligible individuals and families (Title XIX of the Social Security Act). The Centers for Medicare and Medicaid Services administers the program at the federal level. In Pennsylvania, the Department of Human Services administers the Medicaid program and awards grants directly to managed care organizations (“MCOs”) for physical health services, such as hospital and physician services.

4. PA DHS pays each of the Medicaid MCOs a monthly capitation payment for each enrolled beneficiary, whether the medical coverage is utilized or not. The capitation payment is determined by rating categories. The rating categories are based on the beneficiaries’ county of residence and category of aid status according to the state agency or Social Security Administration. The MCOs must provide all contracted services to their members and provide the administrative and quality structure for those services within that fixed amount.

5. PA DHS assists, coordinates, and approves applications from Pennsylvania residents for various state and federal benefit programs, including SNAP and Medicaid. The eligibility determinations are based on a showing of financial need after considering an applicant’s income and resources. An applicant applies for these benefits at local County Assistance Offices (“CAO”).

6. In determining eligibility, the CAO relies upon the truthfulness and accuracy of the information provided by the applicant. The application forms bear warnings that any intentionally false statement is punishable by law and advise the applicant that he/she is obligated to report any changes in his/her financial status.

7. In Pennsylvania to apply for such benefits, SNAP and Medicaid applicants are required to submit information including their social security number, employment, income, and assets by completing an online electronic application, called Compass, Application for Cash Assistance, Food Stamp Benefits, and Medical Assistance.

8. During the application process, applicants must electronically sign and date the Compass application, which states, “I understand and agree that I am responsible for any fraudulent statement made on this application,” and states, “I certify that all information in this application is true and correct under penalty of perjury.” Further, the online application form warns:

a. “I understand that if I misrepresent, hide or withhold facts that may affect my eligibility for benefits, I may be required to repay my benefits and I may be prosecuted and disqualified from receiving certain future benefits.”

b. “I understand that I am responsible for any fraudulent statements made on this application even if the application is being submitted by someone acting on my behalf.”

c. “I understand that I must use the Electronic Benefit Transfer (EBT) or the PA Access Card only during the period I am eligible. I must use the EBT or the PA Access Card only for the person who is eligible and may get only the benefits that are needed and reasonable.”

d. “I understand that if I am determined eligible for Medical Assistance, I will be placed in the most comprehensive health care benefit package that is available to me. I understand that I may be required to enroll in a health plan. I understand that enrolling in a health plan may be free or low cost to me, because the Department pays a monthly

fee to the health plan for me. I understand that the monthly fee is a capitation fee. I understand that if I receive Medical Assistance that I am not eligible for, due to error, fraud or any other reason, then I may be required to repay the Department all monthly fees paid on my behalf.”

9. In connection with the online Compass application, the applicant must submit an identification containing a photograph, usually a Driver’s License or State Identification Card.

10. An applicant that submits his/her application and is approved by PA DHS receives a Pennsylvania Access Card or “EBT” card, which operates similarly to United States currency and debit cards, in that recipients can purchase food from authorized grocery retailers for the face value of their SNAP benefits. Recipients are also able to use their EBT cards to obtain cash through ATMs located throughout the state. In addition, recipients are able to make purchases using their EBT cards and receive cash back at certain terminals.

11. If an applicant is approved for Medicaid coverage, the recipient receives a Medicaid card.

#### **SCHEME TO DEFRAUD**

12. From in or about November 2019 through in or about November 2023, in the Eastern District of Pennsylvania and elsewhere, defendant JAMES SESSOMS participated in a scheme to defraud the USDA of SNAP benefits and HHS and PA DHS of Medicaid benefits, by submitting false and fraudulent benefit applications, including false and fraudulent identification documents in connection with his applications.

13. As part of the scheme, defendant JAMES SESSOMS obtained or created the names, social security numbers and personally identifiable information for several fictitious persons, and obtained the names and personally identifiable information of other persons,

including valid social security numbers, which he placed on the Compass application for SNAP and Medical benefits, which were submitted to PA DHS, under penalty of perjury. To obtain these benefits, defendant SESSOMS also submitted false and fraudulent driver's licenses bearing his photograph under those fictitious and other persons' names.

14. As part of the scheme, on some of the online Compass applications, defendant JAMES SESSOMS added purported family members, such as a spouse and children, which caused for more funds to be awarded for SNAP benefits, but also caused additional Medicaid costs, including additional capitation costs for all of the added family members. To obtain these benefits with family members on the applications, defendant SESSOMS submitted fraudulent names and personally identifiable information for a spouse and children. Defendant SESSOMS submitted fraudulent birth certificates for the children. The social security numbers utilized in connection with these identities were valid social security numbers, assigned by the Commissioner of Social Security, but assigned to other individuals than the names alleged by defendant SESSOMS.

15. From in or about November 2019 to in or about November 2023, PA DHS, with joint federal funding from HHS, provided Medicaid coverage to defendant JAMES SESSOMS under his numerous aliases as well as to his purported family members as he indicated on his fraudulent applications.

16. From in or about November 2019 through in or about November 2023, PA DHS, with federal funding from the USDA, provided SNAP benefits to defendant JAMES SESSOMS under his numerous aliases as well as to his purported family members as he indicated on his fraudulent applications.

17. Through this scheme, defendant JAMES SESSOMS fraudulently obtained a total of approximately \$398,708.58 in SNAP and Medical benefits. Those losses are detailed as follows:

<b>Fictitious/ Assumed Name</b>	<b>Application Date through Termination of Benefits</b>	<b>Total Fraudulent SNAP benefits received</b>	<b>Total Fraudulent Medical Benefits</b>
J. R	April 16, 2020- November 30, 2020 Medical: April 16, 2020- February 10, 2022	\$1,066.95	\$18,151.48
J. We.	March 2, 2020- March 31, 2022 Medical: March 2, 2020- April 14, 2023	\$9,223.78	\$21,139.45
J.Wi.	November 15, 2019- October 31, 2021 Medical: November 15, 2019- October 31, 2020	\$2,372.91	\$9,706.38
C. J.	March 6, 2020- June 30, 2023 Medical: March 6, 2020-July 1, 2023	\$41,006.50	\$70,854.35
F. L.	January 19, 2020- November 30, 2021 Medical: January 19, 2020- October 20, 2023	\$3,188.02	\$86,230.13
R. M.	January 21, 2020- September 30, 2021 Medical: January 19, 2020- November 6, 2021	\$11,516.26	\$37,101.48
D. S.	January 30, 2020- November 30, 2021 Medical: January 30, 2020- October 20, 2023	\$2,182.16	\$84,968.73
Totals:		<b>\$70,556.58</b>	<b>\$328,152.00</b>

18. From in or about November 2019 through in or about November 2023, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JAMES SESSOMS**

knowingly and unlawfully used and acquired Supplemental Nutrition Assistance Program benefits funded by the United States Department of Agriculture, and by such conduct obtained approximately \$70,556.58 in a manner contrary to the statutes and regulations of the Supplemental Nutrition Assistance Program.

In violation of Title 7, United States Code, Section 2024(b).

**COUNTS TWO THROUGH EIGHT**  
**(False Statements in Connection with a Health Care Benefit Program)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 16 of Count One of this indictment are realleged here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania, and elsewhere, defendant

**JAMES SESSOMS**

knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation, that is, a false name and false social security number for himself as detailed in the chart below, or a false name and false social security number for purported family members, in connection with the delivery of and payment for health care benefits, items and services involving Pennsylvania Medicaid, a health care benefit program as defined in Title 18, United States Code, Section 24(b) (each application constituting a separate count of this indictment):

<b>Count</b>	<b>Fictitious/ Assumed Name</b>	<b>Application Date through Termination of Benefits</b>	<b>Total Fraudulent Medicare Benefits</b>
2	J. R.	April 16, 2020- February 10, 2022	\$18,151.48
3	J. We.	March 2, 2020- April 14, 2023	\$21,139.45
4	J. Wi.	November 15, 2019- October 31, 2020	\$9,706.38
5	C. J. Spouse: D. J. Children: B. J.; E. J.; and M. J.	March 6, 2020-July 1, 2023	\$70,854.35
6	F. L. Spouse: C. L. Children: V. L.; A. L.; and A. L.	January 19, 2020- October 20, 2023	\$86,230.13
7	R. M. Spouse: T. M. Children: M.M.; K. M.;	January 19, 2020- November 6, 2021	\$37,101.48

	and T. M.		
8	D. S. Spouse: B. S. d Children: B.S.; D. S.; and K.S.	January 30, 2020- October 20, 2023	\$84,968.73

All in violation of Title 18, United States Code, Section 1035(a)(2).

**COUNTS NINE THROUGH FIFTEEN**  
**(Misuse of Social Security Numbers)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. Paragraphs 1 through 16 of Count One of this indictment are realleged here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

**JAMES SESSOMS,**

for the purposes of applying for and obtaining SNAP benefits from the United States Department of Agriculture to which he was not entitled, with intent to deceive and knowing the representation to be false, falsely represented a social security number to be the social security account number assigned to him by the Commissioner of Social Security on the following applications for SNAP benefits (each application constituting a separate count of this indictment):

<b>COUNT</b>	<b>Application with Misused Social Security Number</b>	<b>Social Security Number</b>
9	April 16, 2020 Application of J.R.	xxx-xx-8149
10	March 2, 2020 Application of J.We.	xxx-xx-9908
11	November 15, 2019 Application of J.Wi.	xxx-x-1829
12	March 6, 2020 Application of C.J.	xxx-xx-8229
13	January 19, 2020 Application of F.L.	xxx-xx-2370
14	January 19, 2020 Application of R.M.	xxx-xx-9062
15	January 30, 2020 Application of D.S.	xxx-xx-6125

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

**NOTICE OF FORFEITURE NO. 1**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violation of Title 7, United States Code, Section 2024(b), set forth in Count One of this indictment, defendant

**JAMES SESSOMS**

shall forfeit to the United States of America all property, real and personal, used in a transaction, to commit, or to facilitate the commission of, a violation of this offense, and or proceeds traceable to a violation of this offense; including but not limited to the sum of \$70,556.58.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 7, United States Code, Section 2024(h), Title 28, United States Code, Section 2461(c), Title 18, United States Code, Section 981(a)(1)(C).

**NOTICE OF FORFEITURE NO. 2**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Section 1035(a)(2), set forth in Counts Two through Eight of this indictment, defendant

**JAMES SESSOMS**

shall forfeit to the United States of America all property, real and personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense, including but not limited to the sum of \$328,152.00.

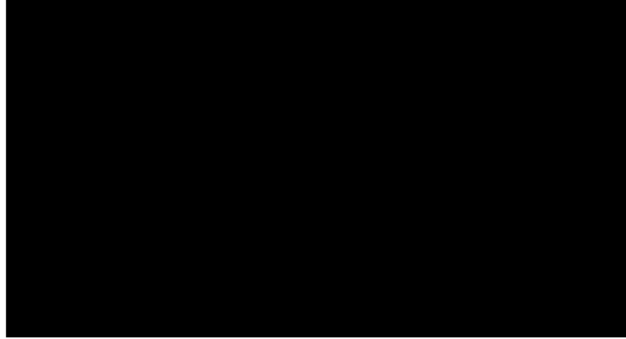
2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:


- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other

property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(7).



  
**JACQUELINE C. ROMERO**  
**UNITED STATES ATTORNEY**

No. -----

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

JAMES SESSOMS

INDICTMENT

Counts

7 U.S.C. § 2024(b) (SNAP fraud- 1 count)  
18 U.S.C. § 1035 (false statements in connection with health care benefits - 7 counts)  
42 U.S.C. § 408(a)(7) (Social Security fraud- 7 counts)

Notices of forfeiture

Filed in \_\_\_\_\_ day,

Of October A.D. 20 24

Foreperson

Bail, \$ \_\_\_\_\_